

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO: 4:19-CR-00832
	§	
GERALD M. GOINES	§	

MOTION TO GRANT
PROPOSED AGREED SCHEDULING ORDER

TO THE HONORABLE GEORGE C. HANKS, UNITED STATES DISTRICT
JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

COMES NOW, GERALD M. GOINES, Defendant, by and through his
undersigned counsel, respectfully moves this Honorable Court to grant the proposed
scheduling order and for good cause would show as follows:

I.

The Court has requested counsel for the defense and for the government to
confer and propose a scheduling order. The proposed scheduling order is suggested
jointly by the defense and the prosecution:

Pretrial Motions Due: August 19, 2025

Responses to Pretrial Motions Due: September 3, 2025

Pretrial Conference: September 9, 2025

Jury Selection & Jury Trial: September 15, 2025

II.

Counsel for both parties request this Honorable Court to grant the proposed scheduling order.

WHEREFORE, PREMISES CONSIDERED, Defendant, respectfully prays that this motion be granted, and that the Court issue the scheduling order with proposed dates.

Respectfully submitted,

/s/ Nicole DeBorde HOCHGLAUBE
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Attorney for Defendant,
GERALD M. GOINES

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CERTIFICATE OF CONFERENCE

On December 12, 2024 counsel for Defendant conferred with AUSA, Arthur Jones, who is in agreement with the proposed schedule.

/s/ Nicole DeBorde Hochglaube
NICOLE DEBORDE HOCHGLAUBE

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system under seal, and contemporaneously sent the motion to AUSA Arthur Jones via email.

/s/ Nicole DeBorde Hochglaube
NICOLE DEBORDE HOCHGLAUBE